

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 22-CR-10038-IT
	)	
ARIEL LEGASSA,	)	
Defendant.	)	

**UNITED STATES' BILL OF PARTICULARS**  
**FOR FORFEITURE OF ASSETS**

The United States of America, by and through its attorney, Rachael S. Rollins, United States Attorney for the District of Massachusetts, hereby files the following Bill of Particulars for Forfeiture of Assets.

On February 17, 2022, a federal grand jury sitting in the District of Massachusetts returned a ten-count Indictment, charging Ariel Legassa (the "Defendant"), with Mail Fraud, in violation of 18 U.S.C. § 1341 (Counts One through Seven); and Money Laundering, in violation of 18 U.S.C. § 1957 (Counts Eight through Ten). The Indictment also contained forfeiture allegations, which gave the Defendant notice that the United States will seek forfeiture, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, upon conviction of one or more of the offenses alleged in Counts One through Seven, of any property, real or personal, which constitutes or is derived from proceeds traceable to the offenses and, pursuant to 18 U.S.C. § 982(a)(1), upon conviction of one or more of the offenses alleged in Counts Eight through Ten, of any property, real or personal, involved in such offense, and any property traceable to such offenses.

Pursuant to, and without limiting in any manner the forfeiture allegations of the Indictment, the United States hereby gives notice that it is also seeking forfeiture of, without limitation, the following specific property:

- a. \$46,000 in funds held in or on behalf of American Broadcast Employees Federal Credit Union Prime share accounts ending in x4170, seized on March 29, 2022;
- b. A 2020 Tesla Model 3, bearing vehicle identification number 5YJ3E1EB4LF639020, seized on April 11, 2022; and
- c. A 1972 Piper Aircraft with model number PA-28R-200 bearing serial number 28-R-7335039, seized on April 11, 2022.

Respectfully submitted,

RACHAEL S. ROLLINS  
United States Attorney,

By: /s/ Carol E. Head  
BENJAMIN A. SALTZMAN  
CAROL E. HEAD  
Assistant United States Attorneys  
U.S. Attorney's Office  
1 Courthouse Way, Suite 9200  
Boston, MA 02210  
(617) 748-3100  
carol.head@usdoj.gov

Dated: May 13, 2022